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Attorney for Defendant Joanna Perez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA)
Plaintiff,)
vs.)
ROBERT PEREZ, et al.,)
Defendant.)
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2:12-cr-00360-JCM-VCF
CASE NO.: ~~2:11-CR-331~~
**DEFENDANT JOANNA PEREZ'S
UNOPPOSED MOTION TO CONDUCT
A PRE-PLEA PRESENTENCING
INVESTIGATION REPORT AND
PROPOSED ORDER**

Comes now, appointed counsel Phil Brown Esq., and hereby moves this Court request a Pre-Plea Pre-Sentence Investigation Report be prepared by the Probation department.

1) It appears that defendant has no criminal history and may be eligible for a sentence outside the applicable United States Sentencing Guideline (U.S.S.G.) range pursuant to U.S.S.G. § 5C1.2, 18 U.S.C § 3553(f) and U.S.S.G. § 2D1.1(b)(6). Whether the defendant is eligible for the Safety Valve will drastically impact her sentencing exposure, negotiations, and client's decision as to how she should proceed. A pre-plea presentence report will promote judicial economy and aid in the manner in which this case is ultimately resolved.

2) Undersigned counsel therefore respectfully requests an order that the Department of Probation conduct a pre-plea presentence investigation report as soon as possible.

3) Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney Robert Knief regarding this request and he has no opposition.

DATED this 5th day of February, 2013.

/s/Phil Brown
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ATTORNEY FOR THE DEFENDANT
SCOTT WEST

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9 Attorney for Defendant – Joanna Perez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence Investigation Report on Defendant Joanna Perez.

DATED this the 22nd day of February, 2013.

U.S. ~~DISTRICT~~ JUDGE
MAGISTRATE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee of Brown Law Offices, Chartered, and is a person of such age and discretion as to be competent to serve papers.

That on February 5, 2013, he served an electronic copy of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING INVESTIGATION REPORT by electronic service (ECF) to the person named below:

DANIEL BOGDON
United States Attorney

ROBERT KNIEF
Assistant United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, NV 89101

/s/ Philip H. Brown

Employee of Brown Law Offices, Chartered